

REMARKS

A Final Office Action mailed March 11, 2004 has been received and carefully considered. Claims 1-30 are pending in the application. Claims 1, 9, 15 and 23 have been amended. Claims 29 and 30 have been canceled to remove claims 29 and 30 from appeal. Claims 7-8 and 21-22 have been canceled because they have been included in amendment claims 1 and 15 respectively.

In paragraph 4 on page 3 of the Office Action, claims 1-3, 12-17, and 26-30 were rejected under § 102(b) over DeKoning et al. (U.S. Patent No. 5,588,110).

In paragraph 5 on page 5 of the Office Action, claims 1-6, 15-20, and 29-30 were rejected under § 102(e) over Skazinski et al. (U.S. Patent No. 6,574,709).

In paragraph 7 on page 7 of the Office Action, claims 7-11 and 21-25 were rejected under § 103(a) over DeKoning et al. in view of Skazinski et al. (U.S. Patent No. 6,247,099).

Applicants respectfully traverse the §§ 102(b), (e) and 103(a) rejections. Applicants respectfully assert that the requirements are not present and a prima facie rejection fails under 35 U.S.C. §§ 102(b), (e) and 103(a) because the Office Action fails to cite a reference or references that teach, disclose or suggest all the claim limitations of Applicants' application.

The instant application requires at least "sending a message from the first controller to the second controller requesting ownership of a cache line owned by the second controller; and granting ownership of a cache line owned by the second controller, to the first controller, wherein, subsequent to the first controller receiving data that is to be mirrored to the second controller cache line, transferring data to the second controller's cache line from the first controller." According to Applicants' application, a first controller is able to take control of a cache line of a second controller.

Dekoning, as admitted in paragraph 7 on page 7 of the Office Action, fails to disclose the ability of a controller to take ownership of cache lines of a second controller.

Skazinski ('099) fails to remedy the deficiencies of Dekoning. Rather, Skazinski ('099) merely discloses a mechanism for a controller to implicitly reserve a portion of the shared storage devices as needed to satisfy data read and write requests. Skazinski ('099) discloses a reservation table that may be used to indicate which controller has access rights to specific storage volume or unit locations, and optionally what those access rights are. However, the

mechanism disclosed by Skazinski ('099) fails to allow a first controller being able to take ownership of cache lines of a second controller.

Thus, Dekoning and Skazinski ('099), alone or in combination, fail to disclose, teach or suggest a first controller being able to take ownership of cache lines of a second controller. More particularly, Dekoning and Skazinski ('099), alone or in combination, fail to disclose, teach or suggest "sending a message from the first controller to the second controller requesting ownership of a cache line owned by the second controller; and granting ownership of a cache line owned by the second controller, to the first controller, wherein, subsequent to the first controller receiving data that is to be mirrored to the second controller cache line, transferring data to the second controller's cache line from the first controller."

Dependent claims 2-6, 9-14, 16-20 and 23-28 are also patentable over the references, because they incorporate all of the limitations of the corresponding independent claims 1 and 15. Further dependent claims 2-6, 9-14, 16-20 and 23-28 recite additional novel elements and limitations. Applicants reserve the right to argue independently the patentability of these additional novel aspects. Therefore, Applicants respectfully submit that dependent claims 2-6, 9-14, 16-20 and 23-28 are patentable over the cited references.

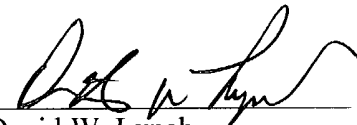
On the basis of the above amendments and remarks, it is respectfully submitted that the claims are in immediate condition for allowance. Accordingly, reconsideration of this application and its allowance are requested.

Appl. No. 10/080,397
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If a telephone conference would be helpful in resolving any issues concerning this communication, please contact Attorney for Applicants, David W. Lynch, at 651-686-6633 Ext. 116.

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